

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.

Plaintiff,

vs.

LM ERICSSON TELEPHONE COMPANY
(TELEFONAKTIEBOLAGET LM ERICSSON)

QUALCOMM, INC.

ALCATEL-LUCENT USA INC.

and

THIRD GENERATION PARTNERSHIP
PROJECT A/K/A 3GPP

Defendants.

Case No. 2:11-cv-4574-RK

PUBLIC VERSION

**JOINT MOTION OF ALL DEFENDANTS TO COMPEL DISCOVERY
DIRECTED TO PLAINTIFF TRUEPOSITION, INC.**

Pursuant to Federal Rule of Civil Procedure 26(g) and 37(a), Defendants jointly move the Court to compel Plaintiff TruePosition, Inc. to produce documents and respond to interrogatories. The grounds for this Motion are set forth in the accompanying Memorandum in Support and Declaration of Benjamin H. Diessel, with Exhibits.

Dated: October 29, 2013

Respectfully submitted,

/s/ Robert N. Feltoon

/s/ Steven E. Bizar

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CERTIFICATE OF SERVICE

I, Robert N. Feltoon, hereby certify that I caused a true and correct copy of the foregoing Joint Motion of All Defendants to Compel Discovery Directed to Plaintiff TruePosition, Inc., and accompanying Memorandum in Support and Declaration of Benjamin H. Diessel, with Exhibits, to be electronically filed pursuant to the Court's electronic court filing system, and that the filing is available for downloading and viewing from the electronic court filing system. I further certify that I caused a true and correct copy of the foregoing Joint Motion, Memorandum in Support, Declaration of Benjamin H. Diessel, and Exhibits to be served this day by hand on the following counsel for Plaintiff TruePosition, Inc.:

BY HAND SERVICE:

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Dated: October 29, 2013

Respectfully submitted,

/s/ Robert N. Feltoon

Robert N. Feltoon